REMARKS

Applicants respectfully traverse and request reconsideration. Applicants wish to thank Examiner Yang for the in-person Examiner interview on October 14, 2004.

Rejection of Claims Under 35 U.S.C. § 103(a)

The Examiner has indicated that Claims 2, 6 through 11, and 21 from application Ser. No. 09/270,256 were rejected under 35 U.S.C. § 103(a) solely based on *Noble*.

Noble is directed to the display of scrolling text messages. (Noble Col. 2, lines 21–23, Figs. 15, 16, 17.) Only one graphics computer 12 generates text images and transfers the text to a chain of video modules 10 in sequence. (Noble, Col. 2, lines 19-21, Col. 6, lines 43–49, Fig. 11). *Noble* further teaches that each video module 10 stores and displays one complete static image rather than active video. (Noble Col. 2, lines 4–7 and 21–23, Col. 3, lines 46–52). Rather than display active video data in a window, *Noble* teaches merely scrolling text by incrementing the column start and stop address counters corresponding with the complete image stored within the video RAM matrix for each video module. (Noble, Col. 4, lines 55–61, Figs. 15, 16, 17).

In contrast, claim 21 recites, "rendering at least a second portion of the first frame of video at a second VGA in response to a second control signal." Among other things, claim 21 recites both a first video graphics adapter and a second video graphics adapter, rather than only one video graphics adapter. *Noble* explicitly teaches only one video graphics adapter at col. 2 lines 19–21 to reduce extra hardware. (Noble, Col. 6, lines 53–55.) Indeed, since *Noble* merely teaches scrolling static text, only a single video graphics adapter is used to generate the static text image, rather than two or more video graphics adapters, in order to render active video and to reduce extra hardware. (Noble, Col. 6 lines 43–55.) Nevertheless, the Office Action on page 3 acknowledges that "*Noble* does not explicitly disclose a first module and a second module for displaying. . . ." However, in contradiction to the teachings of *Noble*, the office action improperly equates the modules 10 of *Noble* to the claimed video graphics adapter, because the modules 10 do not include a video graphics processor for rendering active video data. As previously stated, *Noble* explicitly teaches only a single video graphics adapter 12, and further, the modules 10 do not include a video graphics processor for rendering active video. As a result,

the office action improperly equates *Noble's* modules 10 with the claimed video graphics adapter. For at least the reasons stated above and in view of the explicit language cited above, rather than teach two video graphics adapters, *Noble* teaches only one video graphics adapter.

Further, the assertion in the Office Action that "it would have been obvious to one of ordinary skill in the art to reduce the system into only first and second modules in order to reduce the complexity of the system," also mischaracterizes *Noble* since *Noble* explicitly teaches a single video graphics adapter in the graphics computer 12, rather than a video graphics adapter in each module 10. As a result, *Noble* fails to teach, among other things, both the claimed first video graphics adapter and the second video graphics adapter. Additionally, as explicitly shown in Figs. 15, 16 and 17, *Noble* teaches scrolling static text rather than the claimed active video. As a result, Applicant submits that *Noble* fails to disclose the claimed limitation of active video as arranged in the claims, namely, "rendering at least a second portion of the first frame of video at a second VGA in response to a second control signal, and storing at least a second portion of the active decoded video in the video memory associated with the first VGA." Therefore, for at least these reasons, even if *Noble* is modified as suggested, the Office Action fails to teach each and every element as arranged in the claims. A corresponding showing is requested. Applicant respectfully submits the present rejection is improper, since the Office Action fails to establish a *prima facie* case of obviousness. Reconsideration and withdrawal of the rejection is therefore requested.

The Office Action fails to show or even cite to where *Noble* teaches a window location as claimed. Nevertheless, the Office Action cites to the RAM control of Fig. 12 of *Noble*. The Applicant cannot find where *Noble*, as cited, teaches "a signal specifying a window location," let alone "rendering at least a first portion of the first frame of video at the first VGA in response to a first control signal, wherein the first control signal is a signal specifying a window location for displaying the active video." (Claim 21.) *Noble*, as cited, is silent with respect to a window location. In contrast, the claimed window is a specially delineated area of the screen. A window is typically under the control of the operating system and presents the user with specially delineated areas of the screen. (See Specification page 5 lines 5–11.) The specially delineated portion of the screen may contain its own application, such as an application to play back active video or to display a document, such as is known with a word processor. *Noble* has no need to

display the scrolling text on a window since *Noble* merely scrolls text on the screen. *Noble* merely teaches the display of scrolling text on a particular output device, which is wholly inconsistent with the claimed limitation of specifying a window location for displaying the active video. In other words, *Noble* scrolls an entire text image for display, whereas the claimed present invention claims a signal indicating a window location. Further, since *Noble* fails to teach a window location, *Noble* necessarily fails to teach a first control signal specifying a window location. The cited RAM control 12 or *Noble* merely addresses the memory for scrolling text, rather than teach a first control signal specifying a window location. As a result, *Noble* operates in a completely different manner than the claimed invention, since *Noble* merely scrolls text, whereas the claims recite rendering active video on a window. Consequently, the Office Action fails to show where *Noble* teaches each and every element as arranged in the claims, including, among others, "a first control signal, wherein the first control signal is a signal specifying a window location for displaying the active video." As a result, the Office Action fails to establish a *prima facie* case of obvious.

Claims 2 and 6 Through 11

Regarding claims 2 and 6–11, it is submitted that these claims contain further patentable novel and nonobvious subject matter, and are allowable not merely as being dependent upon an allowable base claim. Applicants repeat the relevant remarks above with respect to Claim 21 and the remarks from previous Office Actions. According to the Office Action, "since the video data is scrolled from the first display device to the second device, the first portion and the second portion are the same portion." (Office Action page 3, paragraph 6.) However, since *Noble* requires scrolling, the first and second portions are necessarily different. As such, *Noble,* as cited, fails to teach each and every element in the claims, and therefore the Office Action fails to establish a *prima facie* case of obviousness.

Therefore, Applicant submits that claims 2 and 6–11 are further patentable in view of *Noble,* since *Noble* fails to disclose all of the claimed limitations. Should the Examiner maintain the present rejection, Applicant requests a showing, including column and line numbers, where each of the specific limitations of claims 6–11 and claim 2 are disclosed. In the alternative, Applicant requests reconsideration and withdrawal, and the passage of these claims to issuance.

Rejection of Claims 6 and 7 Under 35 U.S.C. § 103(a)

The Examiner has previously indicated that Claims 6 and 7 are rejected under 35 U.S.C. § 103(a), based on *Noble* and further in view of *Dennison*. The Office Action acknowledges that "*Noble* does not explicitly disclose the first video memory and second video memory are accessible by a Direct Memory Access (DMA) controller associated with the first VGA; however, this is known [ ] as taught by *Dennison*." *Dennison* discloses a memory system in which a CPU may read from RAM or alternately DMA 9 may read from external memory (citing column 8, lines 54–60.) *Dennison*, as cited, states "generally the eight bits of data are loaded into the data input latch from the CPU or directly from an external memory if Direct Memory Access (DMA) techniques are employed." However, as previously stated, *Noble* addresses RAM using counter 56 via RAM lower addresses, and therefore the DMA as suggested by the Office Action would be redundant, thus increasing complexity unnecessarily, since *Dennison* teaches reading data from the data input latch. Therefore, one would not be motivated to modify *Noble* with the teachings of *Dennison*. As a result, the Office Action fails to establish a *prima facie* case of obviousness.

Claim 13 was previously rejected under 35 U.S.C. § 103(a) based on *Noble*, in view of U.S. Patent No. 4,949,169 (Lumelsky). The Office Action acknowledges that "*Noble* does not explicitly disclose the step of storing the window location in a preference file." (Office Action, page 6.) Applicant respectfully resubmits the above-offered position regarding claim 21, and submits that claim 13 contains further patentable subject matter in view thereof. As discussed above, *Noble* fails to disclose a signal specifying a window location, and thereby fails to teach or suggest all of the claimed limitations of independent claim 21. Therefore, adding further limitations with regard to storing the window location in a preference file would not be disclosed by a combination of *Noble* with *Lumelsky*. As a result, the combination of *Noble* and *Lumelsky* fails to teach or suggest all of the claimed limitations, and one of ordinary skill in the art would not be so inclined or motivated to combine these references because the combination thereof fails to produce the claimed present invention. Applicant requests reconsideration and withdrawal of the present rejection.

Claims 22 and 17–18

Claims 22 and 17-18 currently stand rejected under 35 U.S.C. § 103(a) based on *Noble* in view of U.S. Patent No. 5,523,769 (Lauer). Applicant repeats the above relevant remarks with respect to claim 21. According to the Office Action, *Noble* does not explicitly disclose a first module and a second module for displaying. Further, the Office Action acknowledges that *Noble* does not explicitly disclose the video sources of at least one of the following: a video decoder and a television signal. However, the Office Action, citing *Lauer,* does not even assert that *Lauer* teaches "the video sources at least one of the following: a video recorder and a television signal." The Office Action merely states that *Lauer* discloses "a multiple display system in which 'each individual unit or a subgroup is arranged to have its associated module with its own integral processor and memory responsible for font and graphics rendering, image processing, video decoding, clipping and coordination with adjacent modules,' citing column 5, lines 5–10." As such, the Office Action fails to show how *Lauer* teaches "a video source as a video decoder," since *Lauer* as cited merely teaches "each individual unit or a subgroup is arranged to have a disassociated module with its own . . . video decoding." A corresponding showing is requested. No teaching of a source bringing the video decoder is even asserted in the Office Action. As discussed above with regard to claim 21, *Noble* fails to teach or suggest all of the claimed limitations including, *inter alia,* the second control signal is a signal specifying a window location for displaying the active video. As discussed above, *Noble* fails to teach or suggest, among other things, the claimed second control signal, since *Noble* does not specify window locations, but rather determines specific row and columns for the beginning of data alignment for eventual display on a single corresponding display. As a result, the Office Action fails to establish a *prima facie* case of obviousness, since the combination of *Noble* and *Lauer* fails to describe or teach "a video source, wherein the video source is at least one of the following: a video decoder and a television signal." Applicant respectfully submits that the rejection is improper. For at least the reasons stated above, it is submitted that claim 22 contains patentable subject matter in view of the combination of *Noble* and *Lauer.*

Regarding claims 17 and 18, it is submitted that these claims contain further patentable subject matter, and are allowable not merely as being dependent upon an allowable base claim. Therefore, reconsideration and withdrawal is respectfully requested. Should the Examiner

maintain the present rejection, Applicants request a showing, including column and line numbers, of where *Noble* discloses the claimed control signal. In the alternative, Applicants request passage of claims 22 and 17–18 to issuance.

New Claims 23–34

Applicant repeats the above relevant remarks with respect to claim 21. Support for claims 23, 25, and 28–34 may be found in original claims 1–11. Support for claim 24 may be found in the Specification at least on page 6, lines 7–25 and page 5, lines 12–23. Support for claim 26 may be found in the Specification at least on page 2, lines 20–23 and page 5, lines 5–11. Support for claim 27 may be found in the Specification at least on page 6, lines 24–25, page 2, lines 20–23 and page 5, lines 5–11. Applicants repeat the above relevant remarks with regard to claims 21 and 22. Accordingly, new claims 23–34 contain patentable novel and nonobvious subject matter, and are novel in view of the references as cited.

CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance, and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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